



CITY OF NORTHAMPTON
Mayor Mary Clare Higgins
City Hall, 210 Main Street - Room 12
Northampton, MA 01060-3199
(413) 587-1249 Fax: (413) 587-1275

April 21, 2009

VIA: email transmission

Catrice C. Williams, Secretary
Department of Telecommunications and Cable
Two South Station, 4th Floor
Boston, MA 02110

Re: D.T.C. 08-12 "Verizon's Form 500 Amendment Petition"

Dear Ms. Williams:

On behalf of the City of Northampton, MA, I urge you to deny the petition submitted by Verizon to amend the Cable Division's Form 500 Cable Operator's Annual Report of Consumer Complaints to eliminate the annual reporting of the number of subscribers by individual municipalities.

The municipal level subscriber data is essential information to municipalities in negotiating and monitoring cable franchise agreements and in determining and monitoring the annual fees associated with such agreements. Such subscriber count information also enables municipalities to estimate the true consumer impact of cable license requirements spread across the subscriber base. To the best of our knowledge, the Form 500 is the only form filed by cable service providers requiring the number of subscribers in each community. If it is not provided on this form, there is no other way for communities to verify the number of subscribers served by a franchise agreement. If the subscriber count is eliminated from the Form 500, a separate form should be created for submission along with the annual subscriber fee payment explicitly verifying the number of subscribers. Currently, there is no such form required with this payment.

The cable subscriber count is essential information for municipalities in understanding and monitoring the cable systems in their communities. Please ensure that this data continues to be available to municipalities.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Clare Higgins", written over the printed name.

Mayor Mary Clare Higgins